

Dear Mr. Feldman

All four regulatory agencies have proposed increased standards for commercial real estate lending.

I am an employee of a One hundred twenty-five million dollar community bank. Our main focus is commercial lending. We specialize in commercial real estate lending because it is prudent for a community bank in a large metropolitan area to specialize. We, like many of our sister community banks have spotless records and our delinquency's and troubled loans are well below the national average. If these new regulations were to be imposed it would force us, as well as other banks like us to diversify into lending areas in which we have no experience.

Often community banks take real estate for additional collateral as an abundance of caution; the result of this is that the balance sheets appear to be more commercial real estate oriented. The alternative is to have our loans less secure which I am sure is not the objective of the banks or the regulators

These new standards are aimed at the geographic parts of the county that have had huge inflation over the past five years, and the fear that the bottom will drop out of the commercial real estate market. In Ohio we have had very little inflation in real estate over the last 5 years and commercial real estate values have been fairly static.

Please contact the FDIC, the OCC, the Federal Reserve and the OTS and tell them that a one size fits all regulation would be greatly damaging to the banks and thrifts in the state of Ohio.

Thanks,

Roger Blair